

Technical Bulletin 1.3

GMA Updates: Using Population Data

Key Issue

According to a schedule established by the RCW 36.70A.130(4), each city and county in Washington must take action to review and, if needed, revise its comprehensive plan and development regulations to ensure they comply with the Growth Management Act (GMA). [See RCW 36.70A.130(1).] Because the deadlines for GMA Updates and review of urban growth areas (UGAs) are not always concurrent, many jurisdictions are wrestling with when and how to incorporate the Office of Financial Management's (OFM) population forecasts issued in January 2002 into meeting the Update requirement. The Update requirement also now requires that counties and cities fully planning under GMA include an analysis of the population allocated to a city or county from the most recent ten-year population forecast by OFM in their Update. Counties and cities will also need to decide whether this analysis will include a review of its UGA as required by RCW 36.70A.30(3). This bulletin is intended to assist cities and counties that are "fully planning" under the GMA. It will provide guidance, based on current statutes, for using population data in the Update process.

Discussion

For many jurisdictions, the upcoming GMA planning requirements present complex timing challenges. One of the challenges is how to use population data in meeting the deadlines ahead.

What are the deadlines ahead?

Two key deadlines, as follows, are coming up for all counties and cities fully planning under the GMA.

- **GMA Update:** According to a schedule established by the RCW 36.70A.130(4), and every seven years thereafter, counties and cities must review and revise their plans and regulations.
- **Urban Growth Area Review:** At least every ten years, jurisdictions must review UGAs, including densities, pursuant to RCW 36.70A.130(3) and make changes if needed. The statute states: "The county comprehensive plan designating urban growth areas, and the densities permitted in the urban growth areas by the comprehensive plans of the county and each city located within the urban growth areas, shall be revised to accommodate the urban growth projected to occur in the county for the succeeding 20-year period."

These two deadlines are not necessarily concurrent. While the GMA Update deadline clearly applies to all jurisdictions, the UGA Review deadline appears to be triggered by

the initial adoption of a comprehensive plan under the GMA and takes effect ten years after the comprehensive plan adoption. If following adoption a growth management hearings board (GMHB) has found the majority of a jurisdiction's UGAs out of compliance, then the deadline for evaluation of UGAs becomes ten years from the date that the GMHB finds the majority of a jurisdiction's UGAs in compliance. Thus, if a county adopted a comprehensive plan in 1995, its deadline to make any necessary adjustments to UGAs and densities to reflect projected urban growth is 2005, i.e., ten years after the initial comprehensive plan was adopted. While combining the GMA Update and UGA Review processes may not be required, it certainly may make sense and be more efficient for some jurisdictions.

A third key deadline, as follows, applies only to the counties of Snohomish, King, Pierce, Kitsap, Thurston, and Clark and the cities within their borders. (These are the jurisdictions subject to the "buildable lands" statute, RCW 36.70A.215.) Only a minimal discussion of this deadline is included here. The *Buildable Lands Program Guidelines*, available from the Washington State Office of Community Development's Growth Management Services, contains detailed information.

Buildable Lands Evaluation: By September 1, 2002, and every five years thereafter, affected jurisdictions must complete an evaluation of certain data, including whether there is sufficient suitable land to accommodate the county-wide population projection. The statute also requires jurisdictions "to adopt and implement measures" if necessary to increase consistency based on the evaluation. This implementation step would occur after the evaluation is complete and may be combined with the Urban Growth Area Review under RCW 36.70A.130(3). No specific deadline is identified in the statute.

What is the requirement for population data?

OFM provides 20-year population forecasts, expressed in a range from high to low, on a county-by-county basis. Each county consults with its cities and allocates the projected population projection among the county and cities. Sometimes this collaborative process is specified in a county's county-wide planning policies. The collaborative process is very important, though sometimes difficult and time-consuming.

Local comprehensive plans must be based on the OFM forecasts. The last time OFM issued a 20-year forecast was in January 2002.

It should be noted that once counties and cities change the population projections in their comprehensive plans, it is not just UGAs and densities within them they may have to change. New population data will drive other possible adjustments; for example, to plans for transportation, water and sewer, and parks.

Since the deadline for updating GMA plans and regulations does not coincide with the deadline for evaluating UGAs for some jurisdictions, local governments have discretion and flexibility to decide how to handle OFM population projections in their Update process. RCW 36.70A.130(1)(b) does require counties and cities to include an analysis of the population allocated to a city or county from the most recent ten-year population forecast by OFM in their Update.

What are the local options for using population forecasts in the GMA Update process?

Local governments have three basic options, as follows, for using population forecasts in their GMA Update processes. They may choose the one that is most suitable for their situation, depending in part on how the jurisdictions are approaching the Update process and how much the population projections for a county have changed. Some variations, of course, may be possible for each of the basic options listed below.

- **Continue with existing county-wide population projections.**

This option could be used by counties whose GMA Update deadline occurs before its next deadline for a UGA Review. A county and the cities within it could retain their existing population forecast allocations during their GMA Update process, assuming these allocations are consistent with OFM's previous forecast and with the county-wide planning policies. Jurisdictions choosing this option would not immediately reallocate the population projections, nor would they immediately incorporate the latest OFM forecast into either their plans or, under RCW 36.70A.130(3), their UGA Review. Instead, the new population allocation for individual jurisdictions, along with an evaluation of UGAs and densities, would occur after the GMA Update is completed, but prior to the local deadline for the UGA Review. However, counties and cities choosing this option would need to discuss in their updated plan how the new population projections and future county population allocations might affect their plan and include a strategy for incorporating the new population projections and county population allocations in their plan.

- **Use the new OFM county-wide population forecasts.**

Using the new population forecasts appears to trigger the requirement for a review of UGAs and densities, pursuant to RCW 36.70A.130(3). Therefore, this option would involve performing the GMA Update and UGA Review concurrently.

In deciding how to spread the county-wide growth among existing counties and cities, the county, in collaboration with the cities within the county, will need to allocate the new population forecasts among the jurisdictions. The usual requirements for public process and consistency with other laws still apply.

- **Develop county's own population projections and reallocate county population based on these projections.**

Counties, in cooperation with cities within the county, could develop their own population projections so long as the projections are based on reliable sources of information and consistent with other GMA requirements. A county and its cities that use this approach would then proceed with: (a) implementing the county process to "divide up" or allocate the population projection among the respective jurisdictions; and (b) evaluating their UGAs and densities as part of their GMA Update process. Therefore, this option also would involve performing the GMA Update and UGA Review concurrently. **Jurisdictions that use this approach should be aware that their population projections and OFM's should be substantially consistent; if not, they should consult with OFM on the differences. On the rare occasion that OFM and a county do not agree on the population forecasts for that county, a county can appeal OFM's population forecast to a**

GMHB.

If a jurisdiction does a UGA Review, what issues should be considered?

Here are some questions and resources to consider when undertaking a UGA Review that includes population data, pursuant to RCW 36.70A.130(3).

Counties. What is the percentage of growth that has occurred since adoption of the comprehensive plan in rural areas compared to urban areas? Is this consistent with the targets in your comprehensive plan or county-wide planning policies? What residential densities are allowed in rural areas and unincorporated UGAs? How much land is devoted to each type of density? Do these densities need to be revised to meet adopted growth targets for urban and rural areas?

Cities. What is the average urban density within your city? Within your unincorporated UGA? What mechanisms have you used to encourage urban densities within your city? Are these densities consistent with targets established in your comprehensive plan? Do these densities need to be revised to meet any adopted growth targets in the county-wide planning policies and to meet your population allocation?

Resources available from Growth Management Services:

- *Buildable Lands Program Guidelines*, Department of Community, Trade and Economic Development, June 2000.
- *The Art and Science of Designating Urban Growth Areas, Part II: Some Suggestions for Criteria and Densities*, Department of Community, Trade and Economic Development, March 1992.
- *Keeping the Rural Vision: Protecting Rural Character and Planning for Rural Development*, Department of Community, Trade and Economic Development, June 1999.
- *Predicting Growth and Change in Your Communities, A Guide to Subcounty Population Forecasting*, Department of Community, Trade and Economic Development, June 1995.

Contact

For more information, contact the managing director or a regional planner for Growth Management Services, Washington State Office of Community Development, at (360) 725-3000 or by mail at P.O. Box 48350, Olympia, Washington 98504-8350. If you have a question about OFM population forecasts, contact Theresa Lowe, Office of Financial Management, at (360) 902-0588. GMA Update information will also be posted periodically on the following Web site: www.oed.wa.gov/growth.